

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. ____

**ORDER SUSTAINING DEBTORS' OBJECTION TO PROOFS OF CLAIM
FILED BY CELSIUS NETWORK LLC AND ITS AFFILIATED DEBTORS**

Upon the objection (the “Objection”) of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) disallowing and expunging in their entirety from the claims register the proofs of claim set forth in Schedule 1 attached hereto (the “Celsius Proofs of Claim”), pursuant to section 502 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) and rule 3007 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”); and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and upon consideration of the Objection; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

accordance with the Bankruptcy Rules, the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and that, except as otherwise ordered herein, no other or further notice is necessary; and any replies (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and upon the record of any hearing held to consider the relief requested in the Objection; and this Court having found and determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is GRANTED as set forth herein.
2. The Celsius Proofs of Claim set forth in Schedule 1 are disallowed and expunged in their entirety.
3. Kroll Restructuring Administration LLC, as the Debtors’ claims and administrative agent, is authorized and directed to update the claims register maintained in these Chapter 11 Cases to reflect the relief granted in this Order.
4. The Debtors have provided a notice to counsel for Celsius that complies with the notice and service procedures set forth in the Bankruptcy Rules and the Local Rules.
5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (i) an admission as to the validity of any claim against the Debtors; (ii) a waiver of the Debtors’ rights to dispute any claim on any grounds; (iii) a promise or requirement to pay any claim; (iv) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (v) an approval or assumption of any agreement, contract or lease

under section 365 of the Bankruptcy Code; or (vi) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable law.

6. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover is preserved.

7. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

9. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.

Dated: _____, 2024
Wilmington, Delaware

THE HONORABLE JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1**Celsius Proofs of Claim¹**

Claim Number	Debtor	Creditor	Filing Date
3021	Deep Creek Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3130	Digital Custody Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
3140	FTX EMEA Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3152	LedgerPrime Digital Asset Opportunities Fund, LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3202	Global Compass Dynamics Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3232	Liquid Financial USA Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3262	Bancroft Way Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3306	FTX US Services, Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3320	North Dimension Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3350	FTX Services Solutions Ltd.	Celsius Network Limited and its affiliated debtors	6/29/2023
3390	FTX Japan Services KK	Celsius Network LLC and its affiliated debtors	6/29/2023
3454	FTX Exchange FZE	Celsius Network LLC and its affiliated debtors	6/29/2023

¹ Claim Nos. 3232, 3390, 3454, 3650, 3688, 3761, 3807, 3892, 3811, 3991, 3929, 3931, 3939, 3961, 3986, 4012, 4027, 4029, 4038, 4080 and 4574 have already been expunged as a result of the dismissal of the applicable Debtor's chapter 11 case.

3530	West Realm Shires Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
3581	Cedar Bay Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3586	Cardinal Ventures Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3594	Cottonwood Grove Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3620	LedgerPrime LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3623	LedgerPrime Digital Asset Opportunities Master Fund LP	Celsius Network LLC and its affiliated debtors	6/29/2023
3650	LiquidEX LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3657	Hannam Group Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3678	Deck Technologies Holdings LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3688	FTX Certificates GmbH	Celsius Network LLC and its affiliated debtors	6/29/2023
3697	Paper Bird Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
3703	FTX Lend Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3714	GG Trading Terminal Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3735	North Dimension Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3747	Western Concord Enterprises Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023

3761	Quoine Vietnam Co. Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3780	West Realm Shires Financial Services Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3789	Euclid Way Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3805	Allston Way Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3807	Innovatia Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3811	Liquid Securities Singapore Pte Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3817	Pioneer Street Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3818	Mangrove Cay Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3829	FTX Property Holdings Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3832	LedgerPrime Bitcoin Yield Enhancement Fund, LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3843	LedgerPrime Bitcoin Yield Enhancement Master Fund LP	Celsius Network LLC and its affiliated debtors	6/29/2023
3849	FTX Equity Record Holdings Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3851	Alameda Research (Bahamas) Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3853	FTX Canada Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3864	Goodman Investments Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023

3867	North Wireless Dimension Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3882	Hive Empire Trading Pty Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3886	FTX US Trading, Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
3892	Zubr Exchange Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3899	FTX Zuma Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3916	Alameda TR Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3922	Atlantis Technology Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3925	Verdant Canyon Capital LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3928	Alameda TR Systems S. de R. L.	Celsius Network Limited and its affiliated debtors	6/29/2023
3929	FTX Structured Products AG	Celsius Network LLC and its affiliated debtors	6/29/2023
3931	FTX Trading GmbH	Celsius Network LLC and its affiliated debtors	6/29/2023
3935	Alameda Research Holdings Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
3938	FTX Trading Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3939	Alameda Aus Pty Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3942	Blockfolio, Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023

3943	Ledger Holdings Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
3945	Alameda Research KK	Celsius Network Limited and its affiliated debtors	6/29/2023
3948	FTX Digital Assets LLC	Celsius Network LLC and its affiliated debtors	6/29/2023
3949	LT Baskets Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3957	Alameda Research Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3960	Hilltop Technology Services LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3961	Alameda Research Pte Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3963	Alameda Research LLC	Celsius Network LLC and its affiliated debtors	6/29/2023
3965	FTX EU Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3966	Blue Ridge Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3973	FTX Ventures Ltd.	Celsius Network Limited and its affiliated debtors	6/29/2023
3976	LedgerPrime Ventures, LP	Celsius Network LLC and its affiliated debtors	6/29/2023
3979	West Realm Shires Services Inc.	Celsius Network Limited and its affiliated debtors	6/29/2023
3980	FTX Europe AG	Celsius Network Limited and its affiliated debtors	6/29/2023
3982	FTX Japan K.K.	Celsius Network Limited and its affiliated debtors	6/29/2023

3984	Cedar Grove Technology Services, Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3985	Strategy Ark Collective Ltd.	Celsius Network Limited and its affiliated debtors	6/29/2023
3986	Analisyia Pte Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3988	Cottonwood Technologies Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3990	Clifton Bay Investments LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
3991	FTX Switzerland GmbH	Celsius Network Limited and its affiliated debtors	6/29/2023
3992	Alameda Global Services Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
3994	Quoine Pte Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3997	FTX Digital Holdings (Singapore) Pte Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
3998	FTX (Gibraltar) Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
3999	Hawaii Digital Assets Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
4003	Island Bay Ventures Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
4004	FTX Japan Holdings K.K.	Celsius Network LLC and its affiliated debtors	6/29/2023
4006	Technology Services Bahamas Limited	Celsius Network LLC and its affiliated debtors	6/29/2023
4009	Alameda Research Yankari Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023

4011	Clifton Bay Investments Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
4012	Quoine India Pte Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
4017	FTX Hong Kong Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
4018	Deck Technologies Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
4021	West Innovative Barista Ltd.	Celsius Network LLC and its affiliated debtors	6/29/2023
4027	FTX Products (Singapore) Pte Ltd	Celsius Network Limited	6/29/2023
4029	FTX Crypto Services Ltd.	Celsius Network Limited and its affiliated debtors	6/29/2023
4035	Killarney Lake Investments Ltd	Celsius Network Limited and its affiliated debtors	6/29/2023
4037	Maclaurin Investments Ltd.	Celsius Network Limited and its affiliated debtors	6/29/2023
4038	Alameda Research Pte Ltd	Celsius Network LLC and its affiliated debtors	6/29/2023
4054	Crypto Bahamas LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
4080	DAAG Trading, DMCC	Celsius Network LLC and its affiliated debtors	6/29/2023
4105	Good Luck Games, LLC	Celsius Network Limited and its affiliated debtors	6/29/2023
4118	FTX Marketplace, Inc.	Celsius Network LLC and its affiliated debtors	6/29/2023
4574	FTX Products (Singapore) Pte Ltd	Celsius Network Limited and its affiliated debtors	6/30/2023